

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
No. 7:23-CV-897

IN RE:)
CAMP LEJEUNE WATER LITIGATION)
)
This Pleading Relates to:)
ALL CASES)

**PLAINTIFFS' PROPOSED DEMONSTRATIVE EXHIBITS
FOR MARCH 25, 2025 HEARING**

As ordered in this Court's March 12, 2025 Notice (DE 333, p. 8), Plaintiffs' Leadership Group files the attached proposed demonstrative exhibits and respectfully requests the Court's permission to use such demonstrative exhibits at the March 25, 2025 hearing in this matter.

<u>Exhibit</u>	<u>Description</u>
1	Map of water-supply areas with focus on housing areas, barracks, and workplaces included in the Agency for Toxic Substances and Disease Registry (ATSDR) drinking-water exposure and health studies, U.S. Marine Corps Base Camp Lejeune, North Carolina (Maslia et al. 2013, 2016)
2	Close up of Hadnot Point water supply area with emphasis on selected locations
3	Close up of Tarawa Terrace water supply area, with Water Treatment Plant and ABC Dry Cleaners
4	Track 1 Plaintiff Gary McElhiney at Hadnot Point Industrial Area (Bates 01368_MCELHINEY_0000000921)
5	Track 1 Plaintiff Gary McElhiney & Wife Simone at French Creek, Hadnot Point (Bates 01368_MCELHINEY_0000000926)

6	Reconstructed (simulated) finished-water concentrations of tetrachloroethylene (PCE), trichloroethylene (TCE), <i>trans</i> -1,2-dichloroethylene (1,2-tDCE), vinyl chloride (VC), and benzene, and measured concentrations (Faye et al. 2010), Hadnot Point water treatment plant, Hadnot Point–Holcomb Boulevard study area (From Maslia et al. 2013)
7	Reconstructed (simulated) and measured finished-water concentrations of tetrachloroethylene (PCE) and trichloroethylene (TCE) at the Tarawa Terrace and Hadnot Point water treatment plants (Maslia et al. 2016)
8	Reconstructed (simulated) monthly mean concentrations in finished water for tetrachloroethylene (PCE), trichloroethylene (TCE), <i>trans</i> -1,2-dichloroethylene (1,2-tDCE), and vinyl chloride (VC) at the Hadnot Point water treatment plant, Hadnot Point–Holcomb Boulevard Study Area, U.S. Marine Corps Base Camp Lejeune, North Carolina, January 1942–June 2008
9	Simulated PCE and PCE Degradation By-Products in Finished Water, Tarawa Terrace Water Treatment Plant, January 1951–March 1987
10	CLJA Cases By Disease Graph
11	Miscellaneous Charts for Discussion and Illustration Purposes

Respectfully submitted this 18th day of March, 2025.

/s/ J. Edward Bell, III

J. Edward Bell, III (admitted *pro hac vice*)
Bell Legal Group, LLC
219 Ridge St.
Georgetown, SC 29440
Telephone: (843) 546-2408
jeb@belllegallgroup.com

Lead Counsel for Plaintiffs

/s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser (admitted *pro hac vice*)
Lieff Cabraser Heimann & Bernstein, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111
Telephone: (415) 956-1000
ecabraser@lchb.com

Co-Lead Counsel for Plaintiffs

/s/ Robin L. Greenwald

Robin L. Greenwald (admitted *pro hac vice*)
Weitz & Luxenberg, P.C.
700 Broadway
New York, NY 10003
Telephone: 212-558-5802
rgreenwald@weitzlux.com

Co-Lead Counsel for Plaintiffs

/s/ Mona Lisa Wallace

Mona Lisa Wallace (N.C. Bar No.: 009021)
Wallace & Graham, P.A.
525 North Main Street
Salisbury, North Carolina 28144
Tel: 704-633-5244
mwallace@wallacegraham.com

Co-Lead Counsel for Plaintiffs

/s/ Zina Bash

Zina Bash (admitted *pro hac vice*)
Keller Postman LLC
111 Congress Avenue, Suite 500
Austin, TX 78701
Telephone: 956-345-9462
zina.bash@kellerpostman.com

*Co-Lead Counsel for Plaintiffs and
Government Liaison Counsel*

/s/ W. Michael Dowling

W. Michael Dowling (NC Bar No. 42790)
The Dowling Firm PLLC
Post Office Box 27843
Raleigh, North Carolina 27611
Telephone: (919) 529-3351
mike@dowlingfirm.com

Co-Lead Counsel for Plaintiffs

/s/ James A. Roberts, III

James A. Roberts, III
Lewis & Roberts, PLLC
3700 Glenwood Ave., Ste. 410
Raleigh, NC 27612
Telephone: (919) 981-0191
jar@lewis-roberts.com

Co-Lead Counsel for Plaintiffs